

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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UNITED STATES OF AMERICA,

Plaintiff,

v.

ERINEO WALLACE,

Defendant.

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Case No. 1:20-cr-00007-PLM

Hon. Paul L. Maloney  
United States District Judge

**MOTION TO EXTEND TIME TO SURRENDER OF DEFENDANT TO MCC  
CHICAGO BY ONE DAY**

NOW COMES Defendant, Erineo Wallace, by the undersigned attorney and moves this Honorable Court for an Order Extending Defendant's self-surrender date by 24 hours. In support of said motion defendant states as follows.

1. That defendant was sentenced to 90 days incarceration as a result of a violation of supervised release.
2. That at the time of sentence the court allowed for voluntary surrender.
3. Mr. Wallace was ordered by the Bureau of Prisons to surrender to the Metropolitan Correctional Center in Chicago at noon on 12/30/2024.
4. That the day prior to the surrender a great deal of rain waterlogged the defendant's back yard and this morning the car was stuck in the mud, unable to be moved except by machinery. Further complicating the situation, a tire had to be replaced. Mr. Wallace was unable to get to Chicago, today.

5. The car is now apparently operable and Mr. Wallace respectfully requests that the court allow him to report no later than noon tomorrow, December 31<sup>st</sup>, 2024.
6. Defense counsel has appended 3 photographs of Defendant's backyard to this motion. These photographs were provided to defense counsel by defendant.
7. The assistant U.S. attorney on this case was consulted and had no objection to the motion.

Respectfully Submitted,

Dated: December 30, 2024

/s/ Paul L. Mitchell  
PAUL L. MITCHELL (P-32296)  
161 Ottawa NW, Suite 405  
Grand Rapids, MI 49503  
(616) 742-5880